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VIA ECF

Hon. Alison J. Nathan
U.S. District Judge
U.S. District Court for the Southern District of New York
40 Foley Square, Courtroom 906
New York, NY 10007

Re: **Doncouse v. La Colombe Torrefaction, Inc. et al.,**
Civil Action No.: 1:19-cv-09954-AJN (S.D.N.Y.)

JAN 10 2020

Dear Judge Nathan:

This firm represents Defendants La Colombe Torrefaction, Inc. ("La Colombe") and Pony Real Estate LLC ("Pony Real Estate") (collectively with La Colombe, "Defendants") in the above-referenced matter. We write, with the consent of Plaintiff Graciela Bretschneider Doncouse ("Plaintiff"), to respectfully request a thirty (30) day extension of time for Defendants to respond to the Complaint, up to and including February 12, 2020. This is the first request for an extension of La Colombe's responsive pleading deadline, and the second request for an extension of Pony Real Estate's responsive pleading deadline.

By way of background, Plaintiff commenced this action on or about October 28, 2019. (ECF No. 1.) On November 14, 2019, La Colombe executed a waiver of service pursuant to Fed. R. Civ. P. 4. (ECF No. 6) On December 9, 2019, La Colombe requested an extension of Pony Real Estate's responsive pleading deadline, which the Court granted. (ECF Nos. 9, 11.) Accordingly, Defendants responsive pleading deadline is presently January 13, 2020.

Since the Court granted the extension to Pony Real Estate's responsive pleading deadline, the parties have agreed to the terms of a joint representation, and have begun investigating the allegations in the Complaint. Defendants' respectfully request that their responsive pleading deadlines be extended by thirty (30) days to provide additional time to both continue investigating the allegations in the Complaint, and consider a non-litigated resolution of this action with Plaintiff.

We respectfully submit this request in good faith and not to cause undue delay. The granting of this application will not impact any other scheduled deadlines, including the Initial Pretrial Conference schedule for March 27, 2020. We thank the Court for its time and attention to this matter.

SO ORDERED:

HON. ALISON J. NATHAN
UNITED STATES DISTRICT JUDGE



Respectfully submitted,
SEYFARTH SHAW LLP

/s/ Samuel Sverdlov

Samuel Sverdlov

cc: All counsel of record (via ECF)